UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8, MONTANA OFFICE
FEDERAL BUILDING, 10 West 15th St, Suite 3200
HELENA, MONTANA 59626

Ref: 8MO

May 28, 2013

Mr. Paul Bradford
Forest Supervisor
506 U.S. Hwy 2
Libby, Montana 59923

Re: CEQ 20130128; EPA comments on Pilgrim Creek Timber Sale Project Final EIS and Record of Decision

Dear Mr. Bradford:

The Environmental Protection Agency (EPA) Region VIII Montana Office has reviewed the Final Environmental Impact Statement (FEIS) and Record of Decision (ROD) for the Pilgrim Creek Timber Sale Project prepared by the Cabinet Ranger District, Kootenai National Forest (KNF), in accordance with EPA's responsibilities under Section 102(2)(C) of the National Environmental Policy Act (NEPA), and Section 309 of the Clean Air Act, and the Council on Environmental Quality (CEQ) regulations, 40 CFR Parts 1500-1508.

The EPA appreciates receipt of responses to agency DEIS comments and to the comments of the public and other agencies that were provided in the FEIS. The KNF has decided to implement Alternative 3, involving timber harvest on 1,434 acres (512 acres of seedtree harvest, 386 acres of shelterwood harvest, 510 acres of commercial thinning; 26 acres of intermediate harvest to enhance aspen, with logging taking place via tractor on 551 acres and skyline cable logging on 883 acres). Alternative 3 also includes 5.8 miles of new road construction, 4.7 miles of which would be permanent; 47 miles of road reconstruction, and prescribed burning (ecosystem burning) on 4,564 acres.

The EPA's DEIS comments indicated that EPA considered Alternative 4 to be a more judicious selection for the preferred alternative than Alternative 3, since Alternative 4 involved no construction of new roads and addressed the project purpose and need with only 142 acres less timber harvest than Alternative 3. We encourage minimization of new road construction, since roads are often the major anthropogenic sediment source adversely affecting hydrology, water quality, and fisheries; and roads and motorized uses can also adversely affect wildlife habitat, connectivity and security, and air quality, and promote spread of weeds and cause other adverse ecological effects. We noted that Alternative 4 impacted 820 fewer acres via road construction and use than Alternative 3 (i.e., 2,101 acres impacted by road construction and use in Alternative 3, and 1,281 acres impacted by road construction and use in

Alternative 4). Alternative 4 was also the only alternative with a positive present net value of timber harvest (+$56,822 for Alternative 4 vs. a negative $356,884 for Alternative 3), producing 21,288 CCF in sawtimber vs. 24,544 CCF sawtimber production with Alternative 3.

The rationale for selection of Alternative 3 presented in the ROD indicated that Alternative 4 has many of the same advantages as Alternative 3, with both Alternatives 3 and 4 meeting vegetation restoration objectives (e.g., pages 13-27). The ROD stated that both Alternatives 3 and 4 were considered to be environmentally preferred (ROD, page 27). The ROD also stated, however, that the proposed transportation system expansion with Alternative 3 was needed to provide road access to allow harvest treatments of the suitable landbase, and for more cost effective site preparation for tree planting, reforestation surveys, prescribed fire and other management activities such as fire suppression. The ROD further stated that public use of new roads would be controlled after treatments by gates or other closure devices, and that closed roads would require minimal maintenance due to the infrequency of use. In addition the FEIS noted that the amount of new road required to access and manage an acre of ground is higher on the steeper slopes common to the Pilgrim Creek area than in gentler terrain (page 94).

The ROD also noted that treatment units in Alternative 3 are larger, which allow more treatment of beetle impacted lodgepole pine and root disease affected Douglas-fir and grand fir (page 15); and stated that most new road segments under Alternative 3 would be high in the basin and in dry draws with no connectivity to surface waters, and which with proper application of BMPs would not negatively affect watershed integrity (ROD, page 18). Although we note that the FEIS responses also state that extensions of existing roads on spurs 2744C and 2744D would cross some streams (FEIS, page 93).

The EPA appreciates and acknowledges the KNF's explanation and rationale for selection of Alternative 3, but we still consider Alternative 4 to be the environmentally preferred alternative due to construction of 5.8 miles less road while only harvesting 142 acres less timber, having the same amount of ecosystem burning as Alternative 3, and meeting vegetation restoration objectives. We note that a recent study indicated that removing roads by recontour was more effective in mitigating the negative effects of roads on wildlife than gated road closures (*"Efficacy of road removal for restoring wildlife habitat: Black bear in the Northern Rocky Mountains,"* T. Adam Switalski, Cara R. Nelson, http://www.wildlandscpr.org/files/Switalski%20and%20Nelson%202011.%20%20Efficacy%20of%20road%20removal%20for%20restoring%20wildlife%20habitat.pdf).

We are pleased that timber haul roads would be improved with BMPs, culvert upgrades, drainage improvements, disconnecting ditches, and other road surface drainage activities so as to achieve an estimated 89% reduction in road sediment delivery (or roughly 3 tons/year) from haul roads (FEIS, pages 34, 44). We are also pleased that many haul roads were recently upgraded under an administered public works contract (e.g., Roads 149, 2744 and 2706, FEIS, page 44), and the KNF reclassified 49 non-system unclassified road segments (totaling ~21 miles) as decommissioned, and these roads are now stable with no sediment or resource concerns and are grown in with trees and other vegetation (ROD, page 2).

Although we remain concerned about the adequacy of funding to implement needed road maintenance and road BMP upgrades over the long-term. Roads need to be routinely inspected and road BMPs evaluated in regard to their effectiveness, and BMPs improved and/or maintained as needed over time to remain effective. Funding for road maintenance is often limited, and there is a significant backlog of road maintenance needs on National Forests (Source: *"Rightsizing" the Forest Service Road System Part 1: Road Trend Analysis,* March 22, 2007). We encourage the KNF to provide the necessary funding to implement road maintenance on all system roads over the life of the roads.

The EPA appreciates the opportunity to review and offer comments on the EIS, and participate in the NEPA process. If you have any questions please contact Mr. Philip Strobel of our NEPA Review and Compliance Group in Denver at 303-312-6704 or via e-mail at strobel.philip@epa.gov. Thank you for your consideration.

Sincerely,

Julie A. DalSoglio
Director
Montana Office

cc: Suzanne Bohan/Judy Roos, EPA 8EPR-N, Denver
Dean Yashan/Robert Ray, MDEQ, Helena
John Gubel, Cabinet District Ranger, Trout Creek